

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**ANYWHERECOMMERCE, INC. and  
BBPOS LIMITED,**

**Plaintiffs,**

**v.**

**INGENICO INC., INGENICO CORP.,  
and INGENICO GROUP SA,**

**Defendants.**

**Civil Docket No: 1:19-cv-11457-IT**

**Jury Trial Demanded**

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**DECLARATION OF MELISA BOZEMAN IN SUPPORT OF PLAINTIFFS'  
OPPOSITION TO DEFENDANTS' MOTION TO COMPEL**

I, Melissa Bozeman, hereby declare as follows:

1. I am an attorney licensed to practice before this Court and a partner of the law firm Kutak Rock LLP, which represents Plaintiffs in the above-captioned action.

2. I submit this declaration in support Plaintiffs' Opposition to Defendants' Motion to Compel Discovery from Plaintiffs.

3. The number of documents produced by BBPOS, as believed to be responsive to Defendants' Request Nos. 41, 43, and 44, are conservatively estimated to exceed 9,276 documents. A true and correct copy of the screenshot of the page in the database showing the number of responsive documents is attached hereto as **Exhibit A**.

Dated this 31<sup>st</sup> day of December, 2021

/s/ Melissa A. Bozeman  
MELISSA A. BOZEMAN

**DISCO** Ediscovery | Menu | Anywherecommerce, et al v Ingenico |

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bates(bbpos!) & (type(excel) invoice! "P.o." "PO")

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	INDICATORS	TAG COUNT	DOC ID	BATES NUMBER	INFO	EXCERPT
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<input type="checkbox"/>	EXCEL 0  0 13  4	9	1479514	BBPOS_1581394	DATE 10/8/2011 1:18 AM UTC CUSTODIAN Lo, Ben FILENAME HomeATM Royalty.xlsx	Nov-10 Date USD 6.5224 U 500 ROA01 U
<input type="checkbox"/>	EXCEL 0  0 13	9	1488526	BBPOS_1581337	DATE 7/28/2011 7:59 AM UTC CUSTODIAN Lo, Ben FILENAME Delivery Date.xlsx	Microchip MC 10 12831 128 Paid 12-Dec-1
	EXCEL				DATE 10/18/2011 1:20 AM UTC	Nov-10 Date